Baker & Hostetler LLP

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Heather J. McDonald

Email: hmcdonald@bakerlaw.com

Attorneys for Irving H. Picard, Esq., as Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

SAGE REALTY;

LILLIAN M. SAGE, IN HER CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE REALTY AND INDIVIDUALLY AS BENEFICIARY OF SAGE

Adv. Pro. No. 10-04400 (SMB)

REALTY;

MALCOLM H. SAGE, IN HIS CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE REALTY, INDIVIDUALLY AS BENEFICIARY OF SAGE REALTY, AND AS THE PERSONAL REPRESENTATIVE OF THE ESTATE OF LILLIAN M. SAGE;

MARTIN A. SAGE, IN HIS CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE REALTY AND INDIVIDUALLY AS BENEFICIARY OF SAGE REALTY; AND

ANN M. SAGE PASSER, IN HER CAPACITY AS PARTNER OR JOINT VENTURER OF SAGE REALTY AND INDIVIDUALLY AS BENEFICIARY OF SAGE REALTY,

Defendants.

AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the October 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: **Passed**.
- 2. Fact Discovery shall be completed by: June 23, 2017.
- 3. The Disclosure of Case-in-Chief Experts shall be due: September 29, 2017.
- 4. The Disclosure of Rebuttal Experts shall be due: December 8, 2017.
- 5. The Deadline for Completion of Expert Discovery shall be: January 19, 2018.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before February 2, 2018.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before February 16, 2018.

8. The Deadline for Conclusion of Mediation shall be: On or before June 8, 2018.

Dated: November 17, 2016 New York, New York

> By: <u>s/Nicholas J. Cremona</u> s/Heather J. McDonald

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Heather J. McDonald

Email: hmcdonald@bakerlaw.com

BAKER & HOSTETLER LLP

45 Rockefeller Plaza New York, New York 10111 Telephone: (212) 589-4200 Facsimile: (212) 589-4201

Attorneys for Irving H. Picard, Esq., as Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Estate of Bernard L. Madoff

s/ Andrew B. Kratenstein

Consented To:

Andrew B. Kratenstein

McDermott Will & Emery LLP

340 Madison Avenue New York, NY 10173-1922 Telephone: (212) 547-5695 Facsimile: (212) 547-5444

Attorneys for Defendants